

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

) Craig Cunningham

) Plaintiff, Pro-se

)

) v.

CIVIL ACTION NO. 3-09-CV-1497-G

)

) Credit Management L.P.

) et al

) Defendants.

Plaintiff's Motion to extend discovery

1. To the Honorable US District Court:
2. Now comes the Plaintiff's motion to extend discovery. The Defendants in this case have now filed their third initial disclosure in this case and only after the court ordered them to do so notified the Plaintiff of the identity of the general and limited partners of credit Management LP.
3. Additionally, the Defendants have not answered a single question from the Plaintiff regarding the individual employees and there are individuals in this case who are liable parties but who have not yet been joined given the Plaintiff's motion to join additional defendants.
4. Should the Plaintiff be precluded from conducting discovery upon the partners of Credit Management LP and the additional defendants not yet joined, it would be prejudicial and harmful to the Plaintiff's case. Additionally, should the District judge deny the Defendants appeal of the Magistrate's order for the Defendants to participate in the discovery process, the Plaintiff would not be able to ask followup questions.
5. The Plaintiff prays the court extend discovery for 45 days after the District court judge rules on the Defendants appeal.

6. Certificate of Conference: The Plaintiff has conferred with the Defendants
counsel and they are opposed.

7. Certificate of Service:

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I hereby certify that a true copy of the foregoing was sent the attorney of record for this case:

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Plaintiff, Pro-se

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